

California Public Utilities Commission Committee on Finance and Administration



Report on Strategic Directive 03 – Reliability and Resiliency

Deputy Director Lee Palmer, Office of Utility Safety Safety and Enforcement Division April 24, 2019



Strategic Directive 03 – Reliability and Resiliency

- 1) Assure an adequate supply of regulated services and adequate infrastructure to deliver the services.
- 2) Assure the quality of products and services provided by regulated entities.
- 3) Assure that the utility systems are resilient and capable of recovering from adverse events—such as accidents, natural disasters, and those related to cyber and physical security.
- 4) Assure regulated entities have proactive maintenance programs that are adequate verifiable, and auditable.





Emergency Response Plans – Electric and Gas Utilities



- Filed Under General Order 166 & GO 112-F
- All Electric and Gas Emergency Plans Received and Reviewed by SED.





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Assure regulated entities have proactive maintenance programs that are adequate, verifiable, and auditable

Safety And Enforcement Division performs a variety of assurance activities to validate that the regulated entities maintain programs that are adequate and in compliance with the Commission's General Orders.

Safety and Reliability assurance activities include:

- Adequate
 - Compliance
 - General Orders and modifications:
 - R.15-05-006: GO 95 High Fire Threat District requirements,
 - R.16-12-001: GO 95 Rule 18 electric maintenance
 - R.11-02-019: GO 112-F
 - CA Public Utilities Code
 - Performance
 - Metrics review
 - Outage monitor
- Verifiable
 - Field inspection
- Auditable
 - Records audit





Assure regulated entities have proactive maintenance programs that are adequate, verifiable, and auditable 2018 Gas, Electric, and Communications Facilities:

- Audits / Inspections 61
- Incident Investigations and Customer Complaints 667
- Monitoring Electric Generating Facilities (Natural Gas and Renewable)
 - Forced Outages 95+
 - Planned Outages 75+
- Enforcement Actions \$13.35 million (including one citation appeal pending in K.18-03-008)
- Enforcement Activity Investigation into PG&E's Failure to Comply with Locate-and-Mark Program (I.18-12-007)

Specific questions should be directed to Safety and Enforcement Division.





Assure regulated entities have proactive maintenance programs that are adequate, verifiable, and auditable

In 2018, GSRB proactively altered gas utility programs

• Incident Investigations:

- Utility procedures were revised to target additional audience, added additional warning, and additional guidance to company personnel were added.
- Utility provided additional enhanced refresher training on reporting requirements and reporting responsibilities, and sent out a communication to all company personnel the importance of reporting requirements and reporting on a timely basis.

• Inspections:

 Utility modified and implemented corrective actions to its procedure(s) to ensure that the failure to perform leak surveys will not happen again.





Assure regulated entities have proactive maintenance programs that are adequate, verifiable, and auditable

ESRB Proactive Steps to Improve Oversight of Maintenance Programs

- Enhance coordination with CALFIRE on wildfire and related issues
- Prioritize audits/inspections in high fire threat areas
- Increase focus on vegetation management and new wildfire technology innovations
- Assist in SB 901 and de-energization proceedings
- Expand power plant audits/inspections to include renewable generating facilities, including solar, wind, and geothermal
- Reorganized regionally to improve incident response time and consistency between facilities and power plant oversight
- Implemented new web-based outage reporting system for power plant outages





Compliance with Strategic Directive 03

SED staff believe the organization is substantially in compliance with SD-03





Questions?

